

## **POLLUTION**

(Last update - February 2004)

## **PREVENTION**

(Last update - February 2004)

**E-100**

**IS THE LESSEE PREVENTING POLLUTION OF OFFSHORE WATERS AND, IF POLLUTION IS DETECTED, HAS THE LESSEE REPORTED THE POLLUTION IN ACCORDANCE WITH 30 CFR 254.46?**

**Authority:** 300(a)  
254.46

**Enforcement Action:** W/C/S

**INSPECTION PROCEDURE:**

Visually check the waters surrounding the facility when approaching, leaving, or passing a facility by boat or helicopter. Observe the waters during the inspection tour. Look for sheens, slicks, waste, and other pollutants originating from the facility.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC:

1. For pollution or spills observed but corrected prior to the inspection; or
2. If the operator has not reported the pollution in accordance with 30 CFR 254.46.

Issue a component shut-in (C) INC for the specific component that has been determined to be the cause of pollution.

Issue a facility shut-in (S) INC when more than one specific component has been determined to be the cause of the pollution. Examples: Multiple high water producing wells; upset in the production process train that cannot be corrected immediately; departing oil or gas pipeline leak.

**INSPECTION FORM:**

Enter one item checked per facility.

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**E-101**

**IS THE LESSEE DISPOSING OF DRILL CUTTINGS, SAND, AND OTHER WELL SOLIDS AS APPROVED?**

**Authority:** 300(b)(2)

**Enforcement Action:** C/S

**INSPECTION PROCEDURE:**

1. Prior to the inspection, review the approved APD to determine the approved method of disposal of cuttings, sand, and other well solids.
2. Visually inspect to verify that the cuttings, sand, and other well solids are being disposed of as approved.

**IF NONCOMPLIANCE EXISTS:**

Issue a component shut-in (C) INC for drilling/workover operation if the cuttings, sand, and other well solids are not being disposed of as approved and simultaneous operations are being conducted.

Issue a facility shut-in (S) INC if the cuttings, sand, and other well solids are not being disposed of as approved.

**INSPECTION FORM:**

Enter one item checked per facility.

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E-102

**IS THE FACILITY EQUIPPED WITH CURBS, GUTTERS, DRIP PANS, AND DRAINS NECESSARY TO COLLECT ALL CONTAMINANTS NOT AUTHORIZED FOR DISCHARGE?**

**Authority:** 300(b)(4)

**Enforcement Action:** W/C/S

**Note:**

1. Curbs are to prevent fluids from spilling onto deck areas or into offshore waters.
2. Gutters are to prevent overflow and to channel fluids to a specified location without allowing spillage onto deck areas or into offshore waters.
3. Drip pans are placed under machinery that routinely experiences leakage. Drip pans need not be present when machinery subject to leakage is equipped with an adequate curb/gutter and drainage system. Drip pan and drains shall be installed to prevent overflow.

**INSPECTION PROCEDURE:**

1. Visually inspect the adequacy of all curbs, gutters, drip pans, and drains.
2. Verify that all deck areas where fluids would otherwise collect and stand are equipped with a drainage system and that all drains are free of blockage.
3. Visually check all drains for piping to a sump system.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when obvious maintenance is required on the curbs, gutters, drip pans, or drains to prevent future pollution incidents and pollution is not occurring.

Issue a component shut-in (C) INC:

1. For the component(s) that uses inadequate curbs, gutters, drip pans, or drains.
2. When the drain is damaged, or is not piped to a sump system.

Issue a facility shut-in (S) INC when the curbs, gutters and drains are deteriorated and unable to collect all contaminants not authorized for discharge, causing, or creating frequent pollution incidents and the curbs, gutters and drains cannot be corrected immediately.

**INSPECTION FORM:**

Enter one item checked per facility.

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E-103

**DOES THE SUMP SYSTEM AUTOMATICALLY MAINTAIN THE OIL AT A LEVEL SUFFICIENT TO PREVENT DISCHARGE OF OIL INTO OFFSHORE WATERS?**

**Authority:** 300(b)(4)

**Enforcement Action:** W/C/S

**INSPECTION PROCEDURE:**

Inspect the sump system to verify that the level controls are operated automatically to prevent the discharge of pollutants into offshore waters.

**Note:** MODU's are not required to maintain an automatic sump tank since the rig has no place to automatically discharge the contaminants.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the sump system is improperly maintained and pollution is not occurring.

Issue a component shut-in (C) INC for the component(s) that use the sump system when the level controls do not operate automatically to prevent the discharge of pollutants into offshore waters.

Issue a facility shut-in (S) INC when the sump system is not properly designed, operated and maintained to eliminate pollution incidents and the system cannot be corrected immediately.

**INSPECTION FORM:**

Enter one item checked for each facility.

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E-105

**ARE ALL GRAVITY DRAINS EQUIPPED WITH A WATER TRAP OR OTHER MEANS TO PREVENT GAS IN THE SUMP SYSTEM FROM ESCAPING THROUGH THE DRAINS?**

**Authority:** 300(b)(4)

**Enforcement Action:** W/C/S

490(q)(13)

490(q)(14)

**INSPECTION PROCEDURE:**

1. Identify the location of all gravity drains on the facility.
2. Inspect each gravity drain to verify that it has a water trap or other means to prevent gas from the sump system from escaping.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the drain is equipped with a water trap, but the trap does not contain water.

Issue a component shut-in (C) INC for the component serviced by a drain when the drain is the only drain on the platform not equipped with a water trap or other means to prevent gas from the sump system from escaping.

Issue a facility shut-in (S) INC when two or more drains are not equipped with a water trap or other means to prevent gas from the sump system from escaping.

**INSPECTION FORM:**

Enter one item checked for each facility.

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**E-106**

**ARE SUMP PILES NOT USED AS PROCESSING DEVICES?**

**Authority:** 300(b)(4)

**Enforcement Action:** C

**Note:** Sump piles are intended to collect clear water from source water wells, treated-produced water, treated-produced sand, or liquids from drip pans and deck drains, and act as a final trap for hydrocarbon liquids in the event of equipment upsets. The use of the sump pile as a processing device increases the risk of pollution since there is no trap beyond the sump pile.

**INSPECTION PROCEDURE:**

Visually inspect sump system to verify that the sump pile is not being used as a processing device to treat or skim liquids.

**IF NONCOMPLIANCE EXISTS:**

Issue a component shut-in (C) INC for the component feeding the sump pile if the sump pile is being used as a processing device.

**INSPECTION FORM:**

Enter one item checked for each sump inspected.

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**E-107**

**IS THE LESSEE ADHERING TO THE PROHIBITION ON THE ADDITION OF PETROLEUM-BASED SUBSTANCES TO THE MUD SYSTEM WITHOUT PRIOR APPROVAL OF THE DISTRICT SUPERVISOR?**

**Authority:** 300(b)(1)

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

1. Prior to the inspection, review records to confirm if the District Supervisor has approved the use of petroleum-based substances in the mud system.
2. Check the driller's report to confirm if petroleum-based substances have been added to the mud system.
3. Check the drilling mud to confirm the presence or absence of petroleum-based substances.

**IF NONCOMPLIANCE EXISTS:**

Issue a facility shut-in (S) INC for drilling operations if petroleum-based substances have been added to the mud system without prior approval of the District Supervisor.

**INSPECTION FORM:**

Enter one item checked per facility.

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**E-108**

**IS THE LESSEE PREVENTING THE DISPOSAL OF EQUIPMENT, CABLES, CHAINS, CONTAINERS, OR OTHER MATERIALS INTO OFFSHORE WATERS?**

**Authority:** 300(b)(6)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Visually observe the water around the facility during the inspection for objects which may be from the facility.
2. If an object is observed floating in the water, order the lessee to retrieve the object for identification and disposal.
3. During the inspection, observe the personnel employed on the facility for intentional or accidental disposal of any objects overboard.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if any objects are retrieved from the water and it is identified as belonging to the lessee.

. . . . .

.Issue a facility shut-in (S) INC when the operator is observed intentionally disposing of objects and materials overboard or when observed disposal can only be stopped by a total structure shut-in.

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**INSPECTION FORM:**

Enter one item checked per facility.

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## INSPECTIONS AND REPORTS

**NOTE: Reference to PINC's E-121 through E-132 can be found in 30 CFR 254.**

**E-120**

**ARE RECORDS OF THE DAILY POLLUTION INSPECTIONS MAINTAINED AT THE FACILITY OR AT A NEARBY MANNED FACILITY FOR 2 YEARS?**

**Authority: 301(a)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review the records of the facility pollution inspection to verify that:

1. It is conducted daily or another interval approved by the District Supervisor.
2. The records are maintained for a 2 year period.
3. The records are maintained at the facility or a nearby manned facility.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when:

1. The inspections are not conducted as required.
2. The records are not maintained as required.

**INSPECTION FORM:**

Enter one item checked per facility.

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**E-121**

**ARE RECORDS OF THE MONTHLY POLLUTION RESPONSE EQUIPMENT INSPECTIONS KEPT FOR AT LEAST 2 YEARS AT A SITE DESIGNATED IN THE OIL SPILL RESPONSE PLAN?**

**Authority: 254.43(b)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Response Plan and identify the records storage site.
2. Review the records of the monthly pollution response equipment inspections to verify that:
  - A. The inspections are conducted monthly.
  - B. The records are maintained for a 2 year period.
  - C. The records are maintained at the site designated in the Oil Spill Response Plan.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when:

1. The inspections are not conducted as required.
2. The records are not maintained as required.

**INSPECTION FORM:**

Enter one item checked per facility.

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**E-122**

**IS THE POLLUTION RESPONSE EQUIPMENT IDENTIFIED IN THE OIL SPILL RESPONSE PLAN MAINTAINED IN ACCORDANCE WITH THE REQUIREMENTS IN THE PLAN?**

**Authority: 254.43(a)**

**Enforcement Action: W/S**

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Response Plan and identify the pollution response equipment and its maintenance requirements.
2. Verify that the pollution response equipment is maintained in accordance with the requirements.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the equipment is located onshore and is not being maintained as required.

Issue a facility shut-in (S) INC for the platform(s) serviced by the equipment when the equipment is located offshore and is not being maintained as required.

**INSPECTION FORM:**

Enter one item checked for inventory inspected.

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E-123

**ARE THE POLLUTION RESPONSE EQUIPMENT AND MATERIALS IDENTIFIED IN OIL SPILL RESPONSE PLAN LOCATED AT THE DESIGNATED SITE(S)?**

**Authority:** 254.24(a)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Response Plan and identify the required pollution response equipment and materials and the required storage sites.
2. Inspect the designated storage sites to verify that they contain the required equipment and materials.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when:

1. An onshore site does not contain the required equipment or materials.
2. An offshore site does not contain the required materials.

Issue a facility shut-in (S) INC for the platform(s) serviced by the required equipment when the site is located offshore and does not contain the required equipment.

**INSPECTION FORM:**

Enter one item checked for each site inspected.

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**TRAINING AND DRILLS**

(Last update - February 2001)

E-130

**ARE THE RECORDS OF THE POLLUTION CONTROL EQUIPMENT TRAINING CLASS AVAILABLE?**

**Authority:** 254.41(d)

**Enforcement Action:** W

**DEFINITION:**

**Records** – Course-completion certificates issued by the organization providing the training.

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Contingency Plan and identify members of the Oil Spill Response Team and the records storage site.
2. Review the pollution control equipment training class records to verify that:
  - A. A class was conducted in the last 12 months.
  - B. All the team members and alternates received hands-on training in deployment and operation of the equipment.
  - C. All the supervisory team members received training in supervising deployment and operation of the equipment.
  - D. They are maintained at the site designated in the Oil Spill Contingency Plan.
  - E. They include course-completion certificates or attendance records issued by the organization providing the training.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when:

1. The training is not conducted as required.
2. The records are not maintained as required.

**INSPECTION FORM:**

Enter one item checked per facility.

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E-131

**ARE THE RESULTS OF THE POLLUTION CONTROL EQUIPMENT DRILLS AVAILABLE FOR INSPECTION?**

**Authority:** 254.42(e)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Contingency Plan and identify members of the Oil Spill Response Team and the records storage site for pollution control equipment drills.
2. Review the pollution control equipment drill records to verify that:
  - A. A drill was conducted in the last 12 months.
  - B. All the team members participated in the drill.
  - C. They are maintained for the complete 3 year exercise cycle period.
  - D. They are maintained at the site designated in the Oil Spill Contingency Plan.
  - E. They include the drill conditions, the drill results, and the names of the participants.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when:

1. The drills are not conducted as required.
2. The records are not maintained as required.
3. The drill results are not in accordance with the Oil Spill Contingency Plan.

**INSPECTION FORM:**

Enter one item checked per facility.

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E-132

**ARE THE POLLUTION CONTROL EQUIPMENT DRILLS CONDUCTED IN ACCORDANCE WITH THE OIL SPILL CONTINGENCY PLAN?**

**Authority:** 254.42(a)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Review the latest approved Oil Spill Contingency Plan and identify the requirements for the drill.
2. Observe the drill to verify that it is conducted in accordance with the latest approved Oil Spill Contingency Plan.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the drill is not conducted in accordance with the latest approved Oil Spill Contingency Plan.

**INSPECTION FORM:**

Enter one item checked for each drill observed.

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**ARTIFICIAL ISLANDS**

E-200

**ON ARTIFICIAL ISLANDS, ARE ALL VESSELS CONTAINING HYDROCARBONS PLACED INSIDE AN IMPERVIOUS BERM OR OTHERWISE PROTECTED TO CONTAIN SPILLS?**

**Authority:** 300(b)(5)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Visually inspect pits and berms to verify that all vessels containing hydrocarbons have been placed inside the berm.
2. Visually inspect impervious mat installation.
3. Check operators records for consistency with approved plans.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if vessels containing hydrocarbons are not placed inside an impervious berm and pollution is not occurring.

Issue a facility shut-in (S) INC if vessels containing hydrocarbons are not placed inside an impervious berm and pollution is occurring.

**INSPECTION FORM:**

Enter one item checked for each area inspected.

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E-201

**ON ARTIFICIAL ISLANDS, IS DRAINAGE DIRECTED AWAY FROM THE DRILLING RIG TO A SUMP?**

**Authority:** 300(b)(5)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Verify that all drainage ditches are directed away from the drilling rig to an impervious sump by checking location of pits and sumps in relation to drainage areas.
2. Check operators records and drilling plan to confirm the location of sumps.
3. Visually inspect drainage methods from rig areas.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if drainage ditches are not directed away from the drilling rig to an impervious sump and pollution is not occurring.

Issue a facility shut-in (C) INC if drainage ditches are not directed away from the drilling rig to an impervious sump and pollution is occurring.

**INSPECTION FORM:**

Enter one item checked for each area inspected.

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E-202

**ON ARTIFICIAL ISLANDS, ARE DRAINS AND SUMPS CONSTRUCTED TO PREVENT SEEPAGE?**

**Authority:** 300(b)(5)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

Visually inspect all drains and sumps to verify that they have been constructed in accordance with approved plans to prevent seepage.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if a drain or a sump would not prevent seepage and pollution is not occurring.

Issue a facility shut-in (S) INC if a drain or a sump would not prevent seepage and pollution is occurring.

**INSPECTION FORM:**

Enter one item checked for each drain or sump.

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